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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JOSE JAUREGUI and JAVIER DEL
REAL, individuals, on behalf of
themselves and on behalf of all persons
similarly situated,

Plaintiffs,

vs.

CYTEC ENGINEERED MATERIALS
INC., a Delaware corporation, CYTEC
INDUSTRIES INC., a Delaware
corporation, CYTEC AEROSPACE
MATERIALS (CA) INC., a California
corporation, CYTEC PROCESS
MATERIALS (CA) INC., a Delaware
corporation, SOLVAY USA INC., a
Delaware corporation, SOLVAY
CHEMICALS, INC., a Delaware
corporation, and DOES 1 through 50,
inclusive,

Defendant.

CASE No. **8:20-cv-02440-DOC-DFMx**

**NOTICE OF MOTION AND
MOTION FOR FINAL APPROVAL
OF CLASS SETTLEMENT**

Hearing Date: April 25, 2022
Hearing Time: 8:30 a.m.

District Judge: Hon. David O. Carter
Ronald Reagan Federal Building and
United States Courthouse
Courtroom 9D

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE THAT** on April 25, 2022, at 8:30 a.m. in the United
3 States District Court for the Central District of California, located at the Ronald Reagan
4 Federal Building and United States Courthouse, 411 West Fourth Street, Santa Ana, CA
5 92701, in Courtroom 9D before the Honorable David O. Carter, Plaintiffs Jose Jauregui
6 and Javier Del Real (“Plaintiffs”) will move for final approval of the proposed class
7 settlement with Defendants Cytec Engineered Materials Inc., Cytec Industries Inc., Cytec
8 Aerospace Materials (CA) Inc., Cytec Process Materials (CA) Inc., Solvay USA Inc., and
9 Solvay Chemicals, Inc. (“Defendants”).

10 This motion is brought in accordance with the Order dated January 7, 2022 (Doc.
11 No. 52.) and Fed. R. Civ. P. Rule 23(h). This motion is unopposed and based on the
12 Class Action Settlement Agreement ("Settlement" or "Agreement") between the parties
13 filed concurrently with this motion. There have been no objections to the Settlement by
14 any member of the Class.

15 The motion will be based on this Notice of Motion, the Memorandum of Points
16 and Authorities, the Declaration of Norman Blumenthal and attached exhibits, the
17 Declaration of the Plaintiffs, the Declaration of the Settlement Administrator (to be filed
18 after March 28, 2022), the argument of counsel and upon such other material contained
19 in the file and pleadings of this action.

20
21 Respectfully submitted,

22
23 Dated: March 28, 2022

BLUMENTHAL NORDREHAUG BHOWMIK
DE BLOUW

24 By: /s/ Kyle Nordrehaug
25 Norman B. Blumenthal
26 Kyle R. Nordrehaug
27 Attorneys for Plaintiffs
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